

# La Porte ISD SNAPSHOT 1997-98

## Item Definitions

District Name	LA PORTE ISD
County Number and Name	101 HARRIS
Education Service Center Region	Region 4
SSA Status	
1. Accountability Ratings	Academically Acceptable
2. Total Number of Schools	12
3. Number of Regular High Schools	1
----- STUDENTS -----	
4. Total Students	7,392
5. 5 YR % Change in Total Students	-2.5
6. % African American	8
7. % Hispanic	20
8. % White	70
9. % Other	1
10. % Economically Disadvantaged	23.9
11. % Special Education	10
12. % Bilingual/ESL Education	3
13. % Career & Technology Ed.	13
14. % Gifted & Talented Ed.	8
15. Attendance Rate (96-97)	95.1
16. Annual Dropout Rate (96-97)	1.6
17. Number of Graduates (Class of 1997)	344
----- TAAS -----	
% STUDENTS PASSING-ALL GRADES SPRING '98	
18. All Tests Taken	79.7
19. Reading	89.0
20. Writing	88.0
21. Mathematics	85.6
22. African American	58.6
23. Hispanic	73.9
24. White	83.3
25. Other	82.7
26. Economically Disadvantaged	67.4
----- COLLEGE ADMISSIONS TESTS ----- (CLASS OF 1997)	
27. Percent Tested	56.0
28. Percent At Or Above Criterion	23.8
29. SAT I: Mean Total Score	999
30. ACT: Mean Composite Score	19.7
----- STAFF -----	
31. Total Staff FTE	951
32. Total Teacher FTE	458
33. % Central Administrative	1
34. % Campus Administrative	3
35. % Professional Support Staff	8
36. % Teachers	48
37. % Educational Aides	5
38. % Auxiliary Staff	35
39. Average Central Administr. Salary	75,924
40. Average Campus Administr. Salary	52,392
41. Average Profess.Support Staff Salary	41,192
42. Average Teacher Salary	36,754
43. % Minority	23
44. Number of Students Per Total Staff	7.8
45. Number of Students Per Teacher	16.1
----- TEACHERS -----	

46. % Teachers With 1 or More Permits	1.3
47. % With 5 or Fewer Years Experience	28.1
48. Average Years of Experience	13.1
49. % With Advanced Degrees	42.2
50. Teacher Turnover Rate	13.7
51. % African American	4
52. % Hispanic	7
53. % White	88
54. % Other	0
55. % Regular Education	82
56. % Special Education	8
57. % Compensatory Education	4
58. % Bilingual/ESL Education	2
59. % Career & Technology Education	2
60. % Other Education (Includes G & T)	2
----- TAXES AND BUDGETED REVENUES -----	
61. Taxable Value Per Pupil	582,395
62. Equalized Total Tax Rate	1.610
63. State Aid Per Pupil	297
64. Total Revenue	56,176,719
65. Total Revenue Per Pupil	7,600
66. % State	7
67. % Local and Other	92
68. % Federal	1
----- FUND BALANCES -----	
69. Fund Balance (End of 96-97)	13,020,319
70. % Fund Balance (of 97-98 Budget)	21
----- BUDGETED EXPENDITURES -----	
71. Total Expenditures	52,535,780
72. % Instructional	47
73. % Central Administrative	8
74. % School Leadership	5
75. % Plant Services	11
76. % Other Operating	13
77. % Non-Operating	16
78. Total Operating Expenditures	43,945,972
79. Total Operating Expend. Per Pupil	5,945
----- BUDGETED INSTRUCTIONAL -----	
EXPENDITURES	
80. Total Instructional Expenditures	24,688,958
81. Total Instructional Expend. Per Pupil	3,340
82. % Regular Education	83
83. % Special Education	8
84. % Compensatory Education	3
85. % Bilingual/ESL Education	2
86. % Career & Technology Education	3
87. % Gifted & Talented Education	1



**ENGINEERING STATEMENT  
IN SUPPORT OF A  
PETITION FOR RULE MAKING**

**New WAVO Communications, Inc.**

**Prepared by:**

**Reynolds Technical Associates  
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**October, 2000**

**Engineering Statement  
In Support of a  
Petition for Rule Making  
KVST  
New WAVO Communications, Inc.**

**C O N T E N T S**  
**FOR ENGINEERING EXHIBITS**

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### FOR ENGINEERING EXHIBITS

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**Engineering Statement**  
**In Support of a**  
**Petition for Rule Making**  
**New WAVO Communications Group, Inc.**

**General**

The instant petition for rule making (PRM) was prepared for New WAVO Communications Group, Inc. ("New WAVO"), licensee of KVST channel 279C3, Willis, Texas and KUST channel 259C3 Huntsville, Texas. New WAVO propose to delete channel 279C3 at Willis and subsequently allocate channel 279C at La Porte, Texas, as that community's first local service. Also New WAVO proposes to delete its co-owned KUST channel 259C3 Huntsville, Texas, and allot channel 259A to Willis as a replacement channel for KVST. This allows KVST on channel 279C3 to be deleted without Willis being deprived of its only local service. New WAVO proposes that the license of each station upgraded, reassigned and/or channel or class changed, be modified accordingly.

The instant PRM seeks the allotment of channel 279C at La Porte, Texas, in lieu of channel 279C3 at Willis, Texas. The allotment of channel 279C at La Porte requires additional sub-moves (additional spectrum modifications) that allow for the upgrade of KVST and modification of KBIU, KJCS, and KUST.

**Methods**

The New WAVO PRM is presented in sections. Each channel or licensed facility where a change is proposed is discussed individually. All sections begin with an allocation or

channel spacing study. Additional exhibits then support the proposed modification's technical compliance.

All searches were performed on a V-Soft SearchFM program and verified with the EDX FMSR search program. The FCC F(50,50) contours were calculated using SoftWright's Terrain Analysis Package (TAP) Version 4.1.571. The studies were based on the latest technical data from the Commission's databases. Mapping, population counts, and gain/loss areas were conducted using a professional mapping program from MapInfo Corporation, Version 5.5. The program contains the exact community boundaries of the relevant cities. In pertinent cases where community boundaries were critical, the boundaries were cross-checked with U.S. Census Bureau's TIGER maps. See Exhibit E, Figures 4 and 21.

All modifications that require a class change or antenna site modification have a gain/loss study for population and square kilometers. The two facilities that require community of license changes, and the two facilities that propose a change in class, include a remaining services study depicting that no gray or white areas will be created by the proposed moves in the instant PRM.

#### **Nature of The New WAVO' PRM**

A summary of all communities and their related channels (present and proposed) is included in Table 1 for reference. New WAVO proposes to delete channel 279C3 at Willis and substitute channel 279C at La Porte, Texas for use by KVST. In order to accomplish this, various channels and licensed facilities require modification in order to create compliance with §73.207. The PRM provides for first local service at La Porte

and an increase in square kilometers covered. This is demonstrated by the large increase in the number of persons served by the new 60-dBu contour.

The allotment of channel 279C at La Porte requires the following modifications:

I). KVST - channel 279C, Willis (La Porte), Texas. Presently KVST, Willis, Texas, operates on channel 279C3. The site chosen by the KVST licensee does not provide a 70 dBu contour to Willis, therefore the instant New WAVO PRM requires a site change and community of license change for KVST to channel 279C. This change is at a site that provides 100% coverage by a hypothetical class C 70 dBu contour to La Porte, Texas.

The allotment of channel 279C requires the following sub-changes.

A.) KBIU - channel 279C1, Lake Charles, Louisiana. Presently KBIU operates on channel 279C1 licensed to Lake Charles, Louisiana. The allocation of channel 279C at La Porte, using the requested allotment coordinates, creates a spacing of 117.42 kilometers to KBIU while 270.0 kilometers is required for co-channel C to C1. This creates a prohibited short space of 152.58 kilometers. Therefore, New WAVO proposes to eliminate this short space by deleting channel 279C1 at Lake Charles and substituting channel 277C2. The substitution of channel 277C2 for channel 279C1 requires a site modification. In addition, there is a required modification to the licensed facility of KJCS Nacogdoches, Texas, which presently operates on channel 277C1. No additional sub-changes are required.

1). KJCS - channel 277C1, Nacogdoches, Texas. Presently KJCS operates on channel 277C1 licensed to Nacogdoches, Texas with CP reference coordinates that short space the allotment of channel 277C2 at Lake Charles by 34.28



kilometers. Channel 277C1 at Nacogdoches is short spaced to the licensed site of KJCS by 31.10 kilometers. New WAVO seeks to eliminate this short spacing by downgrading channel 277C1 at Nacogdoches to channel 277C2. It proposes that the license of KJCS be modified accordingly. The substitution of channel 277C2 for channel 277C1 at the CP site of KJCS is fully spaced to the proposed allotment of channel 277C2 at Lake Charles.

II). KUST Channel 259C3 Huntsville, (Willis), Texas. Presently KUST operates on channel 259C3 licensed to Huntsville, Texas. It is co-owned with KVST. New WAVO proposes to delete channel 259C3 at Huntsville and substitute channel 259A at Willis as a replacement channel (service). New WAVO requests that the license of KUST be modified accordingly. Therefore, the deletion of channel 279C3 at Willis will not leave that community without local service. The allotment of channel 259A can be made to Willis without any additional modifications in the table of allotments.

This is the total required changes and sub changes required to delete channel 279C3 at Willis and allocate channel 279C at La Porte for use by KVST.

## **EXHIBITS EXPLAINED**

### **KVST**

Exhibit E, Figure 1 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 279C at La Porte. The study depicts all of the major on-channel and adjacent channel modifications required, but not the subchanges. Exhibit E, Figure 2 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the KVST channel 279C

allotment coordinates, a maximum class C 70 dBu contour, and the community boundaries of La Porte. Exhibit E, Figure 3 is an enlargement (zoomed view) of the map area that depicts the proposed 70 dBu and the community of La Porte extreme west-southwest city boundaries. Exhibit E, Figure 4 is a USGS TIGER map of the community of La Porte. Figures 2 – 4 demonstrate full compliance with §73.315 of the Rules. Exhibit E, Figure 5 is a map demonstrating the gain and loss area of the respective 60 dBu contours for KVST. Exhibit E, Figure 6 is a map depicting the remaining services in the loss area after KVST is deleted at Willis and allocated to La Porte. The population with four remaining services is 15,510, and the population with three remaining services is 902. The area inside the four remaining services area is 592.3 km<sup>2</sup>, and the area inside three remaining services is 69.2 km<sup>2</sup>. The areas with four and three remaining services represent 15.0% and 1.8%, respectively, of the total loss area. Exhibit E, Figure 7 is a list of the facilities included in Exhibit E, Figure 6. The numbers shown (on the contours) in Exhibit E, Figure 6 correspond to the number of the facility shown in Figure 7.

#### KBIU

Exhibit E, Figure 8 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 277C2 at Lake Charles. The study depicts only one major on-channel modification required, and there are no sub changes to that modification. Exhibit E, Figure 9 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the KBIU channel 277C2 allotment coordinates, a maximum class C2 70 dBu contour and the community boundaries of Lake Charles. It demonstrates full compliance with §73.315 of the Rules. Exhibit E, Figure 10 is a map demonstrating the gain and loss area of the respective 60

dBu contours for KBIU. Exhibit E, Figure 11 is a map depicting the remaining services in the loss area after KBIU is modified from a class C1 to a class C2 at Lake Charles. The population with four remaining services is 4,297, and the population with three remaining services is 177. The area inside the four remaining services area is 743.2 km<sup>2</sup>, and the area inside three remaining services is 23.4 km<sup>2</sup>. The areas with four and three remaining services represent 31.1% and 1.0%, respectively, of the total loss area. Exhibit E, Figure 12 is a list of the facilities included in Exhibit E, Figure 11. The numbers shown (on the contours) in Exhibit E, Figure 12 correspond to the number of the facility shown in Figure 11.

#### KJCS

Exhibit E, Figure 13 is an allocation study depicting spacing to all known FM facilities of channel 277C2 with the KJCS CP site used as reference coordinates. The study depicts all of the major on-channel and adjacent channel modifications required. Exhibit E, Figure 14 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the KJCS channel 277C2 allotment coordinates, a maximum class C2 70 dBu contour, and the community boundaries of Nacogdoches. This exhibit depicts full compliance with §73.315 of the Rules. Exhibit E, Figure 15 is a map demonstrating the gain and loss area of the respective 60 dBu contours for KJCS. Exhibit E, Figure 16 is a remaining services study depicting the substitution of channel 277C2 for channel 277C2 (KJCS). The population with four remaining services is 5,242, and the population with three remaining services is 5,120. The area inside the four remaining services area is 596.3 km<sup>2</sup>, and the area inside three remaining services is 58.9 km<sup>2</sup>. The areas with four and three remaining services represent 11.6% and 1.2%,

respectively, of the total loss area. Exhibit E, Figure 17 is a list of the facilities used in Exhibit E, Figure 16. The numbers shown (on the contours) in Exhibit E, Figure 16 correspond to the number of the facility shown in Figure 17.

### KUST

Exhibit E, Figure 18 is an allocation study depicting the spacing to all known FM facilities that are affected by the allotment of channel 259A at Willis. The study depicts no on-channel or adjacent channel modifications required for this allocation. Exhibit E, Figure 19 is a map generated using the programs and techniques in the Methods section of the instant PRM. This study depicts the KUST channel 259A allotment coordinates, a maximum class A 70 dBu contour, and the community boundaries of Willis. Exhibit E, Figure 20 is an enlargement (zoomed view) of the map area that depicts the proposed 70 dBu and the community of Willis extreme west-southwest city boundaries. Exhibit E, Figure 21 is a USGS TIGER map of the community of Willis. Figures 18 – 21 demonstrate full compliance with §73.315 of the Rules. Exhibit E, Figure 22 is a map demonstrating the gain and loss area of the respective 60 dBu contours for KUST. Exhibit E, Figure 23 is a map depicting the remaining services in the loss area after KUST is deleted at Huntsville and allocated to Willis. The population with four remaining services is 2,808, and the population with three remaining services is 76. The area inside the four remaining services area is 383.0 km<sup>2</sup>, and the area inside three remaining services is 34.2 km<sup>2</sup>. The areas with four and three remaining services represent 14.9% and 1.3%, respectively, of the total loss area. Exhibit E, Figure 24 is a list of the facilities included in Exhibit E, Figure 23. The numbers shown (on the

contours) in Exhibit E, Figure 23 correspond to the number of the facility shown in Figure 24.

### **Spacing Conflict Elimination**

In MM Docket 99-257 Wolverine Broadcasting sought to have channel 278A allocated to Centerville, Texas. This was offered as a counterproposal, since the initial PRM asked for channel 274A at Centerville. The KJCS present operating facility on channel 277C1 did not appear in the Commission's database, since, for some unknown reason, KJCS did not file a Form 302 after construction was completed and automatic program test commenced. If channel 277C1 at Nacogdoches had appeared at the present operating reference, channel 278 could not have been allocated to Centerville, since there is a 16.34-kilometer short space. Channel 278A was allocated to Centerville before the licensee of KJCS was made aware of the error. Presently a short space exists in the Commission's database of 16.34 kilometers between channel 278A at Centerville and the class C1 operating site at Nacogdoches. Exhibit E, Figure 25 is a channel spacing study using the class C1 operating parameters for KJCS. It depicts the aforementioned short spacing. However, the New WAVO instant PRM seeks to delete channel 277C1 and allot channel 277C2 at Nacogdoches for use by KJCS. This proposed change in the Table of Allotments eliminates all of the conflict presently in MM Docket 99-257 where numerous objecting documents have been filed.

### **The New WAVO PRM Gain-Loss Area**

Exhibit E, Figure 26 is a tabulation of the gain/loss area for each facility that requires an antenna location or class change. There are no stations that are proposed to have only

their present channel substituted at the licensed site, and require no class change. Therefore, every station in the study is included in the cumulative gain-loss study.

The study includes four facilities that have a deviation in their coverage area proposed by the instant PRM. Listed in the study is each station's loss and gain area in square kilometers and the population gains and losses in number of persons according to the U.S. Census Bureau's estimated 1999 population figures. It depicts a cumulative total loss area of 14,015 square kilometers and a gain area of 26,352 square kilometers. The New WAVO PRM has a net area gain of 12,337 square kilometers.

The population loss has a cumulative loss of 322,781 persons, while the population gain is 2,895,976 persons. Therefore, the net population gain of The New WAVO PRM is 2,573,195 persons.

### **Conclusion**

The New WAVO PRM has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The PRM produces a new first local at La Porte, Texas; without the sacrifice of local service loss at Lake Charles, Louisiana; or Nacogdoches, Texas. Willis will continue to receive local service from KUST after that facility is reassigned from channel 259C3 Huntsville, Texas, to channel 259A at Willis.

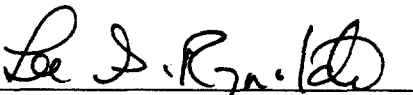
### Statement of the Consultants

The instant engineering portion of a counterproposal was prepared for New WAVO Communications, Inc. and supports a Petition for Rule Making. It was developed by Reynolds Technical Associates (RTA) and may not be used for purposes other than submission to the Commission by New WAVO.

It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:

  
\_\_\_\_\_  
Lee S. Reynolds

October 30<sup>th</sup>, 2000

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# ENGINEERING STATEMENT

In Support of a  
*Petition for Rule Making*

New WAVO Communications, Inc.

Summary of Channel Assignments

(Depicting all communities, channels, and modifications)

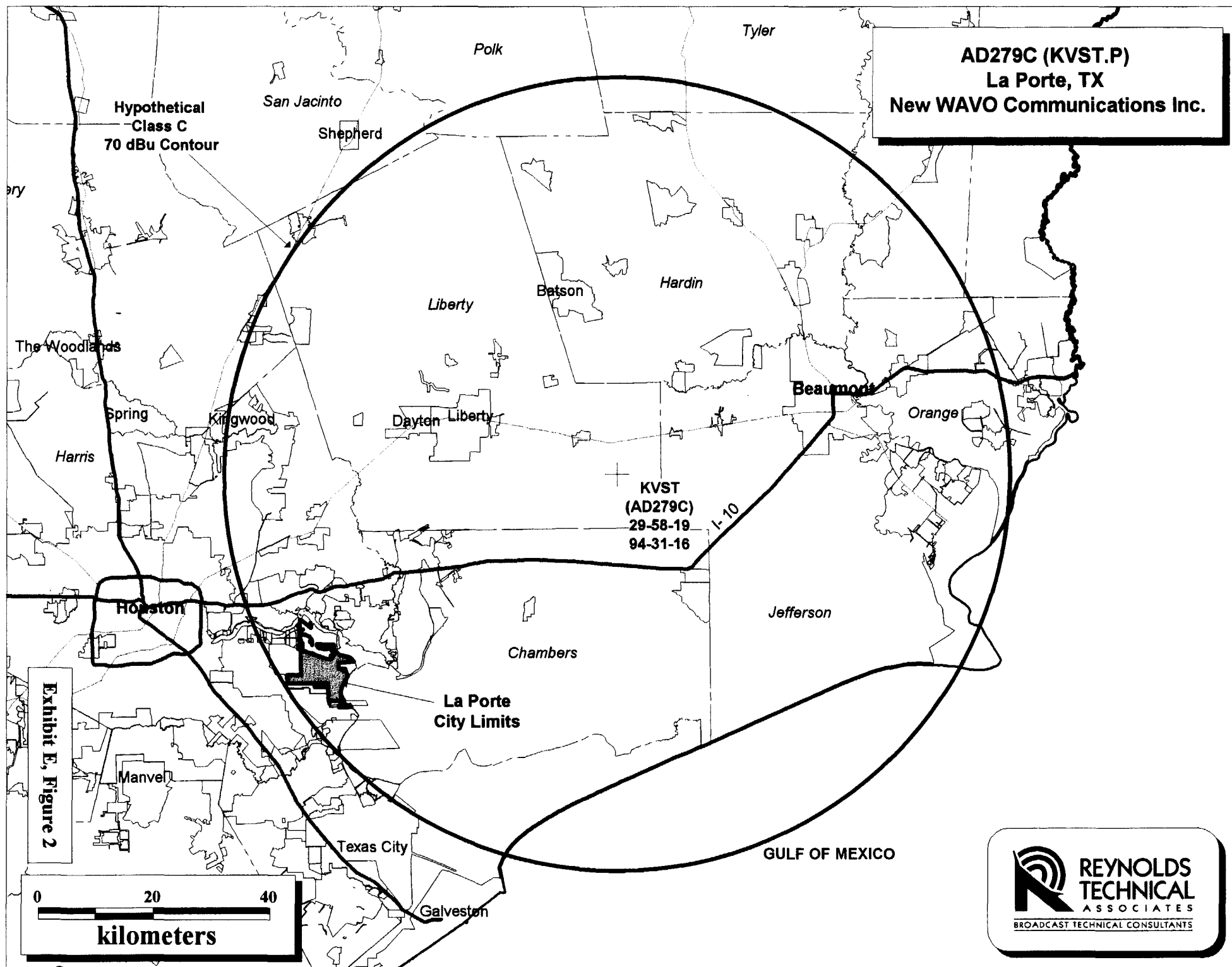
<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED</u>	<u>COMMENTS</u>
La Porte, TX	-----	<b>279C</b>	Delete channel 279C3 at Willis, TX and change community of license to La Porte, TX on Ch 279C as a first local service
Willis, TX	<b>279C3</b>	<b>259A</b>	Delete channel 279C3 at Willis and Change community of license to La Porte, TX on Ch. 279C.
Huntsville, TX	<b>259C3</b> , 269A	269A	Delete Ch 259C3 and substitute Ch 259A at Willis, TX.
Nacogdoches, TX	<b>277C1</b> , 299C2	<b>277C2</b> , 299C2	Delete Ch 277C1 and substitute Ch 277C2 at its existing antenna site.
Lake Charles, LA	241C, 258C1, <b>279C1</b> , 287C2	241C, 258C1, <b>277C2</b> , 287C2	Delete Ch 279C1 and substitute Ch 277C2 at a new reference site.



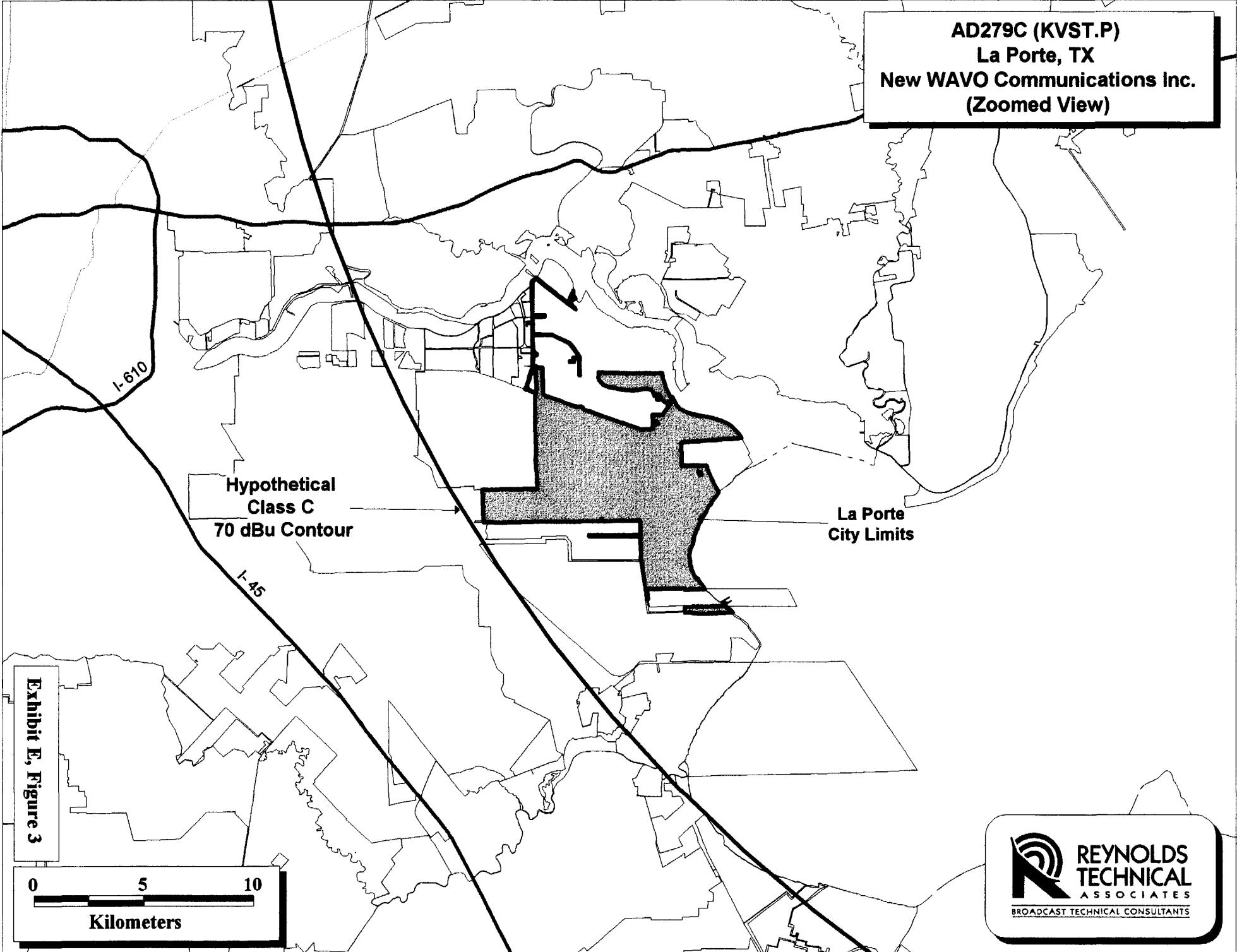
Allocation Study - Ch 279C La Porte, TX (KVST)  
[Depicting spectrum changes required to allot Ch 279C at La Porte]  
(Using proposed Ch 279C allotment coordinates as reference)

Call	Ch#	City	State	Bear'	Dist'	R'grd	Margin
------	-----	------	-------	-------	-------	-------	--------

Modified facility of KJCS proposed  
in instant PRM at present CP site.



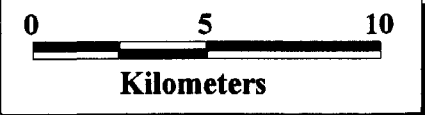
**AD279C (KVST.P)**  
**La Porte, TX**  
**New WAVO Communications Inc.**  
**(Zoomed View)**



**Hypothetical  
Class C  
70 dBu Contour**

**La Porte  
City Limits**

**Exhibit E, Figure 3**

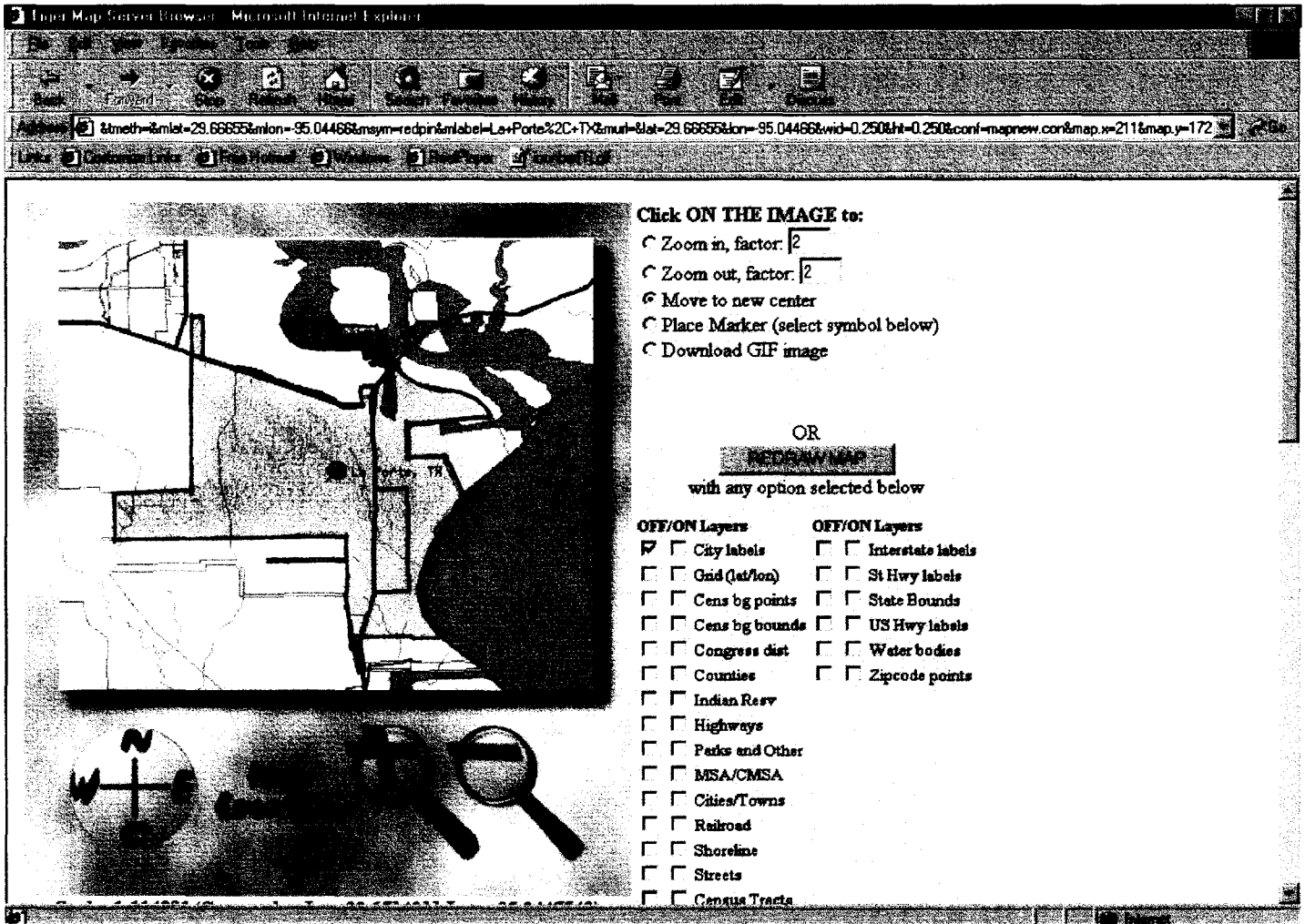


# ENGINEERING STATEMENT

## In Support of a PETITION FOR RULE MAKING

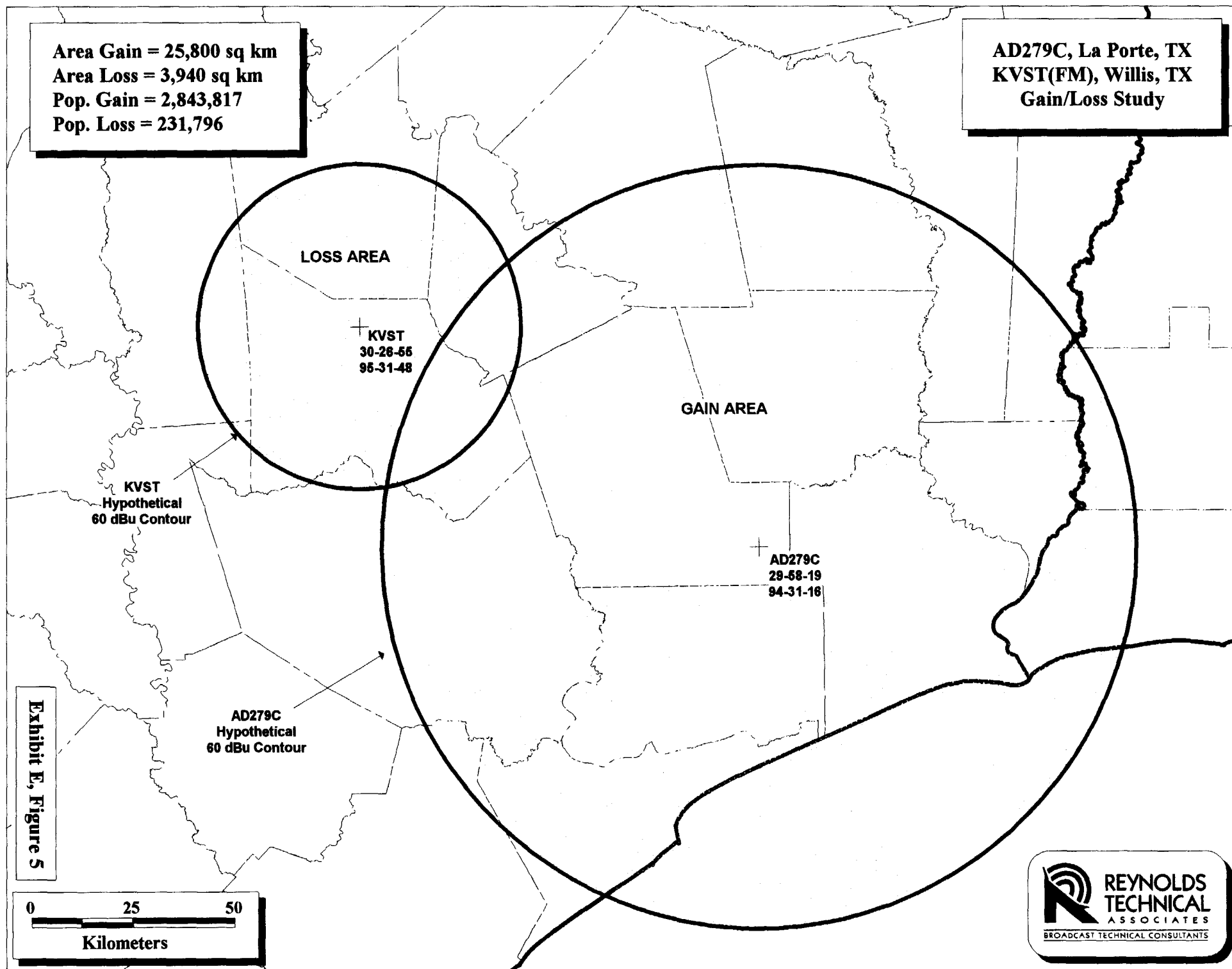
New WAVO Communications Group, Inc.

### TIGER Map of La Porte, Texas

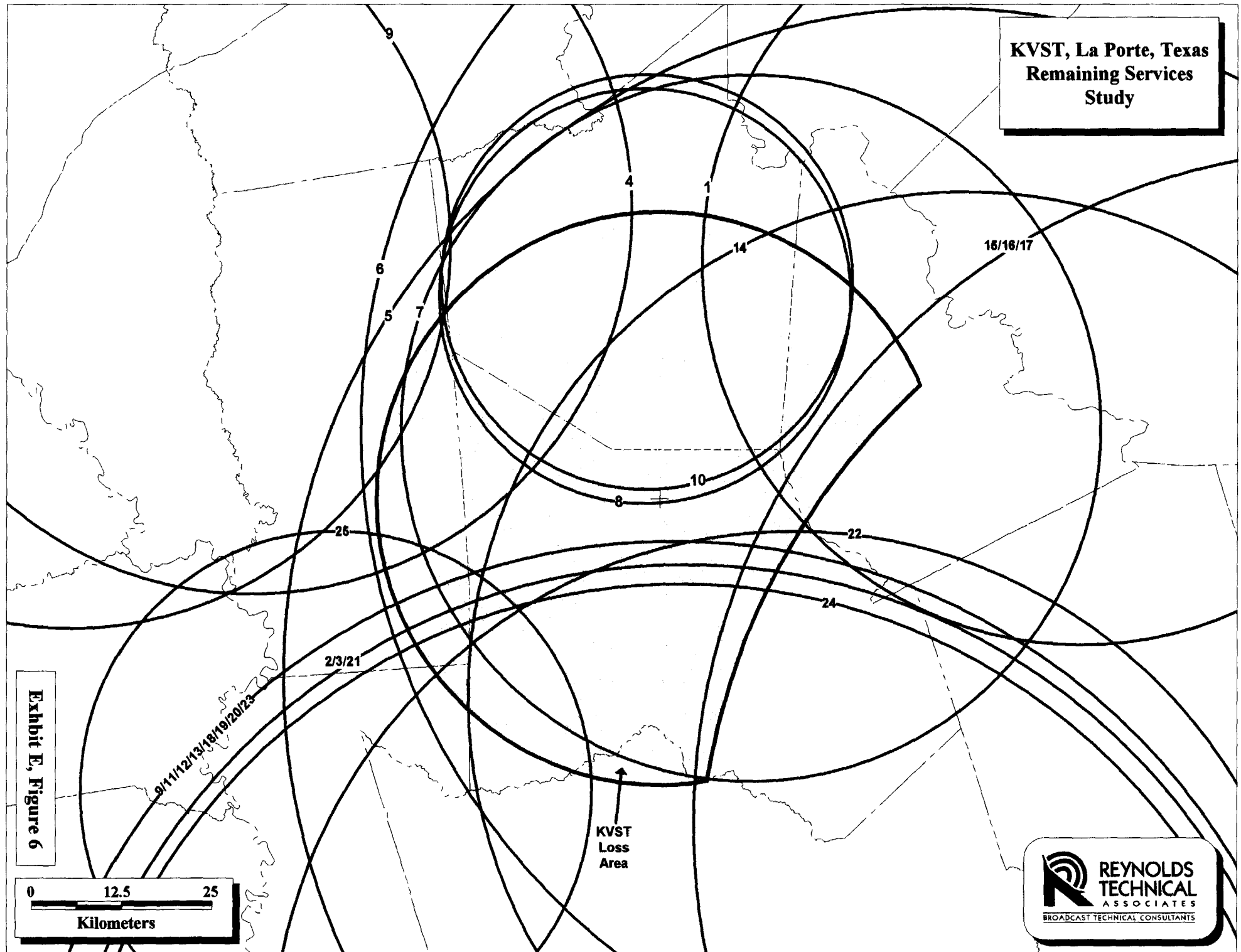


Area Gain = 25,800 sq km  
Area Loss = 3,940 sq km  
Pop. Gain = 2,843,817  
Pop. Loss = 231,796

AD279C, La Porte, TX  
KVST(FM), Willis, TX  
Gain/Loss Study



**KVST, La Porte, Texas  
Remaining Services  
Study**



**Exhibit E, Figure 6**

# ENGINEERING STATEMENT

## In Support of a PETITION FOR RULE MAKING

New WAVO Communications Group, Inc.

### Stations included in KVST Remaining Services Study

<u>Contour Number</u>	<u>Call Letters</u>	<u>City of License</u>	<u>Channel</u>
1	KETX	Livingston, Texas	222C2
2	KUHF	Houston, Texas	204C
3	KKRW	Houston, Texas	229C
4	KAGG	Madisonville, Texas	241C2
5	KZJZ	Conroe, Texas	295C
6	KKTL	Cleveland, Texas	246C
7	KAXF	Conroe, Texas	202C2
8	KSAM	Huntsville, Texas	269A
9	KTBZ	Houston, Texas	233C
10	KSHU	Huntsville, Texas	213A
11	KMVL	Madisonville, Texas	263C3
12	KHMX	Houston, Texas	243C
13	KBXX	Houston, Texas	250C
14	KSBJ	Humble, Texas	207C1
15	KTJM	Port Arthur, Texas	253C
16	KOVE	Port Arthur, Texas	227C
17	KRTX	Winnie, Texas	264C
18	KODS	Houston, Texas	256C
19	KILT	Houston, Texas	262C
20	KLLO	Houston, Texas	266C
21	KMJQ	Houston, Texas	271C
22	KLTN	Houston, Texas	275C
23	KRBE	Houston, Texas	281C
24	KHBC	Houston, Texas	289C
25	KPVU	Prairie View, Texas	217C3

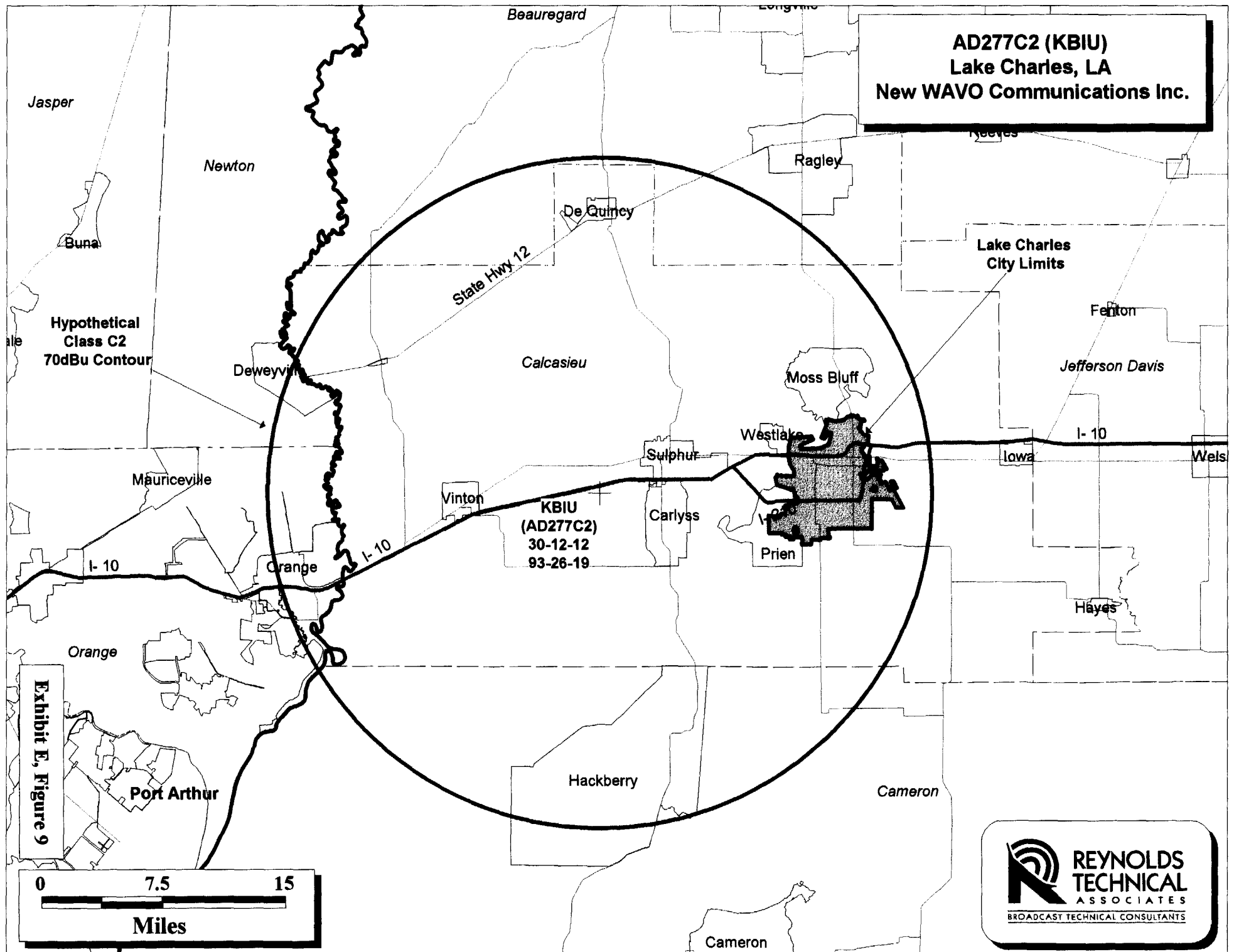
**Engineering Statement**  
**In Support of a**  
**Petition for Rule Making**  
**KVST**  
**New WAVO Communications Group, Inc.**

**Allocation Study - Ch 277C2 Lake Charles, LA (KBIU)**  
**[Depicting spectrum changes required to allot Ch 277C2 at Lake Charles]**  
**(Using proposed Ch 277C2 allotment coordinates as reference)**

30 12 12 N.			Class				Search Date
93 26 19 W.			Current rules spacings				10-03-00
----- Channel 277 -103.3 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>Community of Lake Charles</b>			<b>LA</b>	<b>83.2</b>	<b>21.47</b>		
Reference Coordinates:							
North Latitude: 30-15-35							
West Longitude: 93-13-02							
<b>KBIU 279C1 Lake Charles</b>			<b>LA</b>	<b>63.3</b>	<b>10.21</b>	<b>79.0</b>	<b>-68.79 *</b>
Of No Concern:							
Licensed site and facility of KBIU							
before proposed modification							
to channel 277C2.							
<b>KJCS 277C1 Nacogdoches</b>			<b>TX</b>	<b>315.9</b>	<b>189.72</b>	<b>224.0</b>	<b>-34.28 *</b>
<b>KJCS 277C1 Nacogdoches</b>			<b>TX</b>	<b>322.3</b>	<b>192.90</b>	<b>224.0</b>	<b>-31.10 *</b>
Of Concern:							
CP and Licensed site of KJCS							
before proposed modification to							
channel 277C2 at CP site.							
<b>KAJNFM 275C Crowley</b>			<b>LA</b>	<b>100.1</b>	<b>104.51</b>	<b>105.0</b>	<b>-0.49 *</b>
<b>KJCS.P 277C2 Nacogdoches</b>			<b>TX</b>	<b>315.9</b>	<b>189.72</b>	<b>190.0</b>	<b>-0.28 *</b>
Of Note:							
Modified facility of KJCS after							
Change in class to class C2.							
Reference coordinates;							
NL: 31-25-59, WL: 94-49-03							
<b>WCAC 277C Hammond</b>			<b>LA</b>	<b>85.0</b>	<b>250.43</b>	<b>249.0</b>	<b>1.43 *</b>
<b>KVST.P 279C La Porte</b>			<b>TX</b>	<b>256.2</b>	<b>107.46</b>	<b>105.0</b>	<b>2.46 *</b>
Of Note:							
Proposed site and facility of							
KVST after change proposed in							
instant PRM at;							
NL: 29-58-19, WL: 94-31-16							
<b>KJOJFM 277C Freeport</b>			<b>TX</b>	<b>233.7</b>	<b>260.01</b>	<b>249.0</b>	<b>11.01</b>
<b>KTFA 223C2 Groves</b>			<b>TX</b>	<b>245.7</b>	<b>46.98</b>	<b>20.0</b>	<b>26.98</b>
<b>KLAA 278C2 Tioga</b>			<b>LA</b>	<b>36.1</b>	<b>167.93</b>	<b>130.0</b>	<b>37.93</b>
<b>KWYX 274C2 Jasper</b>			<b>TX</b>	<b>332.2</b>	<b>107.40</b>	<b>58.0</b>	<b>49.40</b>
-----							



**AD277C2 (KBIU)**  
**Lake Charles, LA**  
**New WAVO Communications Inc.**



Area Gain = 275 sq km  
Area Loss = 2,391 sq km  
Pop. Gain = 6,324  
Pop. Loss = 18,404

AD277C2, Lake Charles, LA  
KBIU(FM), Lake Charles, LA  
Gain/Loss Study

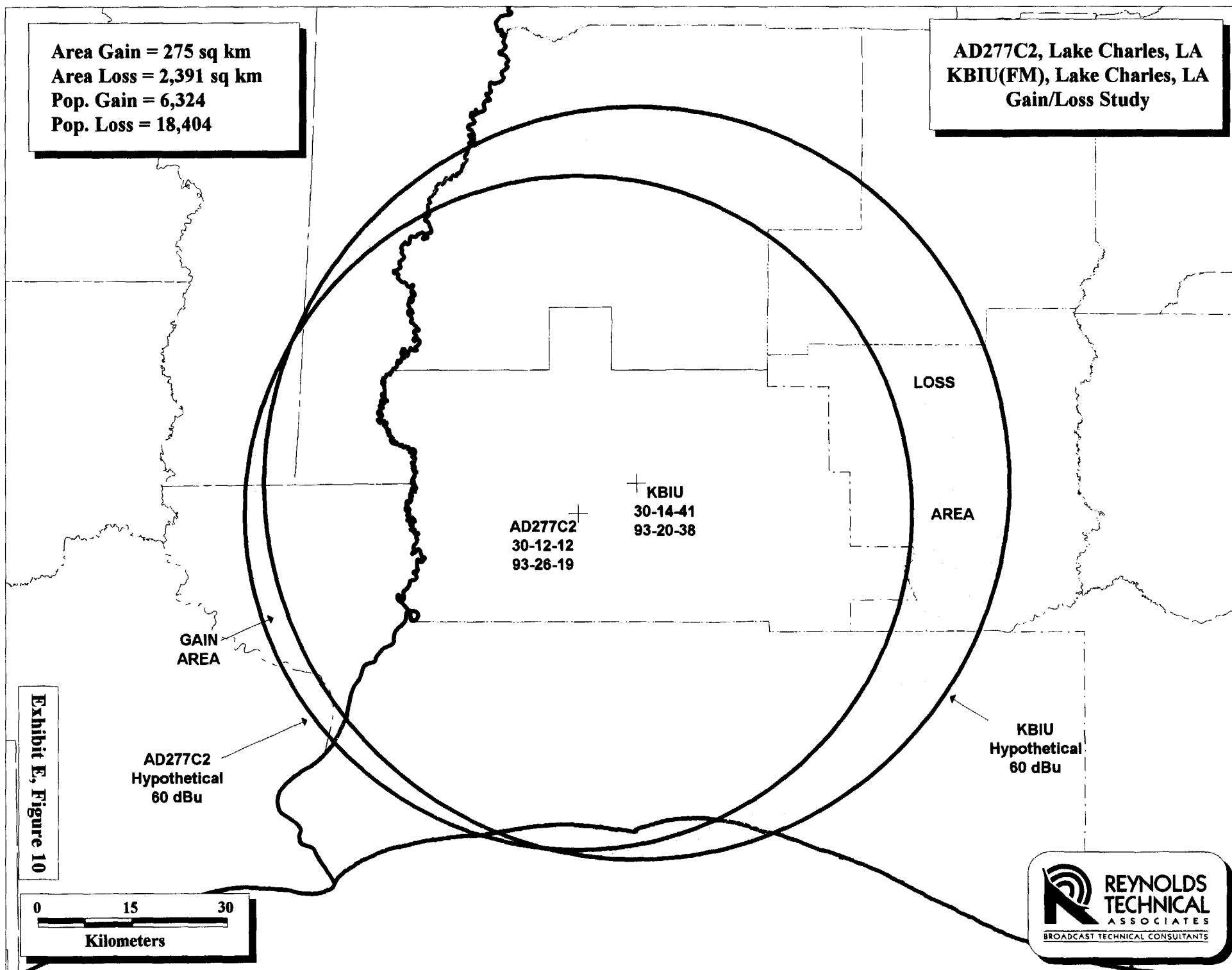
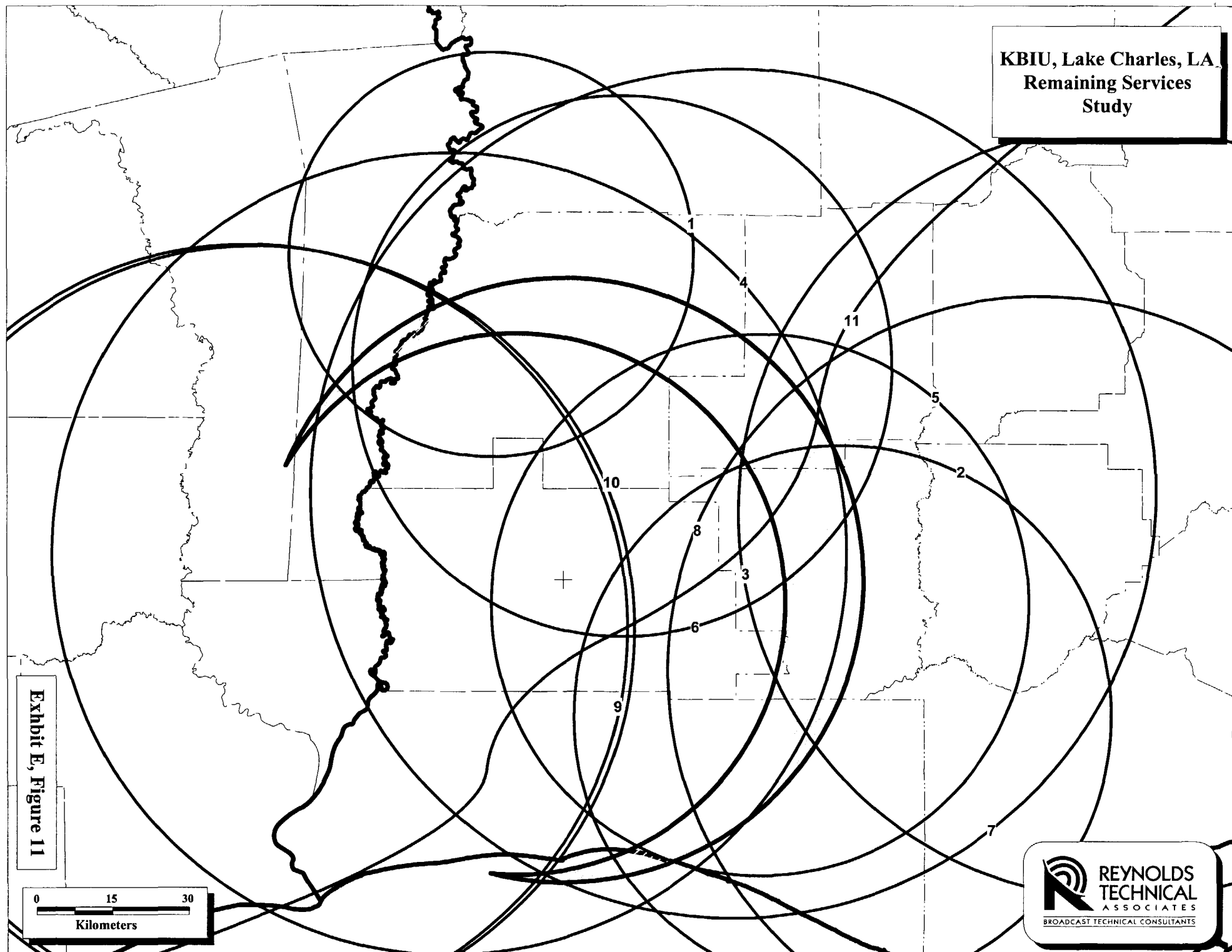


Exhibit E, Figure 10

**KBIU, Lake Charles, LA  
Remaining Services  
Study**



**Exhibit E, Figure 11**

# ENGINEERING STATEMENT

In Support of a  
COUNTERPROPOSAL

New WAVO Communications Group, Inc.

Stations included in KBIU Remaining Services Study

<u>Contour Number</u>	<u>Call Letters</u>	<u>City of License</u>	<u>Channel</u>
1	KROK	De Ridder, Louisiana	221C3
2	KJEF	Jenning, Louisiana	225C2
3	KSMB	Lafayette, Louisiana	233C
4	KYKZ	Lake Charles, Louisiana	241C
5	KVEE	Lake Arthur, Louisiana	298C2
6	KAOK	De Ridder, Louisiana	250C2
7	KHLA	Lake Charles, Louisiana	258C
8	KAJN	Crowley, Louisiana	275C
9	KYKR	Beaumont, Texas	236C
10	KIOC	Orange, Texas	291C
11	WWL(AM)	New Orleans, Louisiana	870 kHz

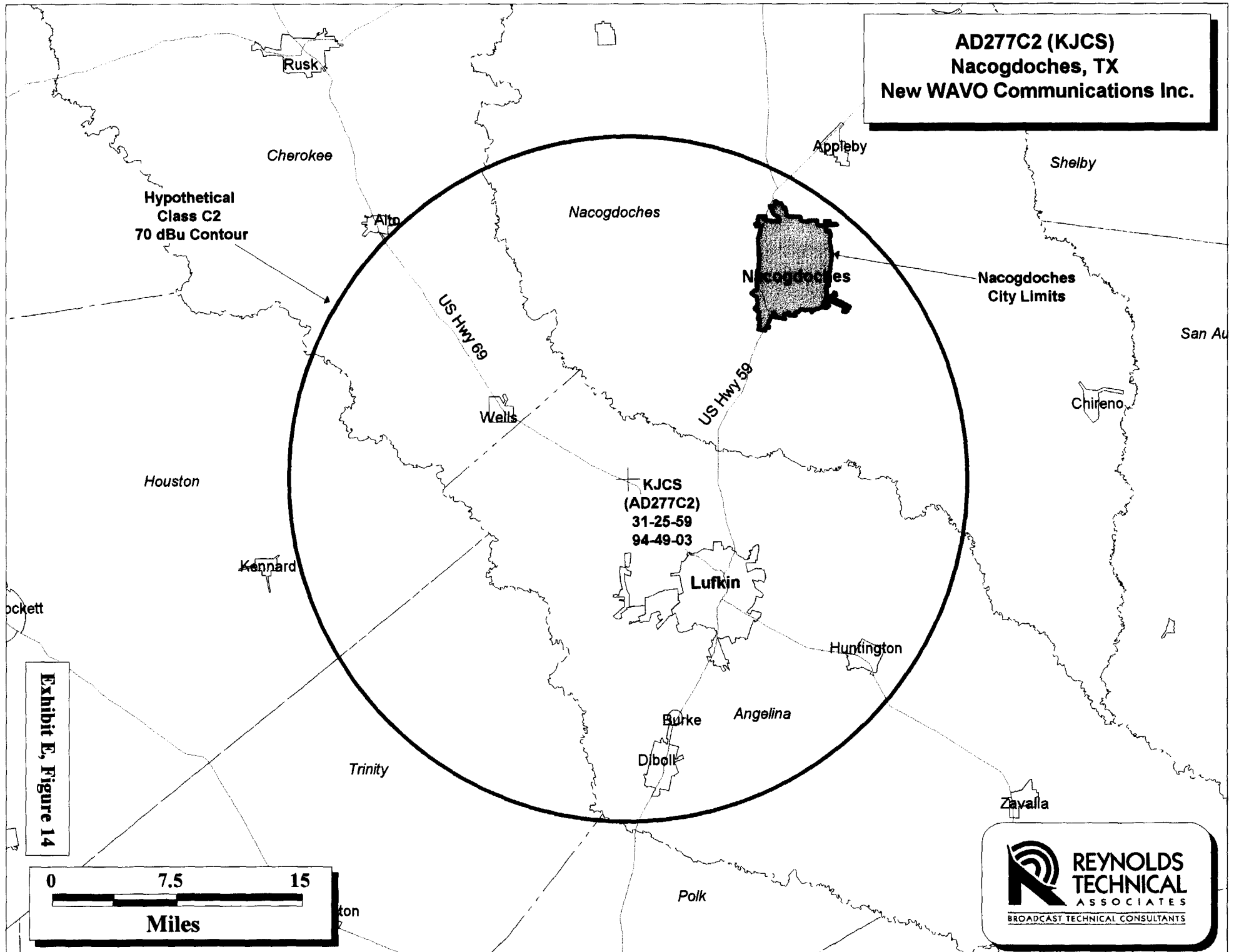
**Engineering Statement**  
**In Support of a**  
**Petition for Rule Making**  
**KVST**

New WAVO Communications Group, Inc.

Allocation Study - Ch 277C2 Nacogdoches, TX (KJCS)  
[Depicting no spectrum changes required to allot Ch 277C2 at Nacogdoches]  
(Using Ch 277C1 CP coordinates as reference)

31 25 59 N.			Class C2				Search Date
94 49 03 W.			Current rules spacings				10-04-00
-----			Channel 277 -103.3 MHz	-----			
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----			-----				
<b>Community of Nacogdoches</b>			<b>TX</b>	<b>39.3</b>	<b>24.35</b>		
Reference Coordinates:							
North Latitude: 31-36-11							
West Longitude: 94-39-19							
<b>KJCS</b>	<b>277C1</b>	<b>Nacogdoches</b>	<b>TX</b>	<b>0.0</b>	<b>0.00</b>	<b>224.0</b>	<b>-224.00 *</b>
Of No Concern:							
CP site and facility of KJCS							
before modification proposed in							
instant PRM.							
<b>KJCS</b>	<b>277C1</b>	<b>Nacogdoches</b>	<b>TX</b>	<b>40.3</b>	<b>21.49</b>	<b>224.0</b>	<b>-202.51 *</b>
Of No Concern:							
Licensed site and facility of KJCS							
before modification proposed in							
instant PRM.							
<b>KBIU.P</b>	<b>277C2</b>	<b>Lake Charles</b>	<b>LA</b>	<b>135.9</b>	<b>189.72</b>	<b>190.0</b>	<b>-0.28 *</b>
Of Note:							
Modification of KBIU to Ch 277C2							
proposed in instant PRM at,							
NL: 30-12-12, WL: 93-26-19							
<b>RADD</b>	<b>278A</b>	<b>Centerville</b>	<b>TX</b>	<b>263.6</b>	<b>116.61</b>	<b>106.0</b>	<b>10.61</b>
<b>RADD</b>	<b>278A</b>	<b>Centerville</b>	<b>TX</b>	<b>263.6</b>	<b>116.61</b>	<b>106.0</b>	<b>10.61</b>
Of Note:							
Allotment of Ch 278A at Centerville							
in MM Docket 99-257. Presently operating							
site of KJCS and allotment of Ch 278A is							
short spaced 16.39 kilometers. Instant PRM							
eliminates this short spacing.							
<b>KWYX</b>	<b>274C2</b>	<b>Jasper</b>	<b>TX</b>	<b>116.9</b>	<b>91.42</b>	<b>58.0</b>	<b>33.42</b>
<b>AVAC</b>	<b>280A</b>	<b>Hemphill</b>	<b>TX</b>	<b>95.2</b>	<b>91.76</b>	<b>55.0</b>	<b>36.76</b>
<b>KTHP.C</b>	<b>280A</b>	<b>Hemphill</b>	<b>TX</b>	<b>96.3</b>	<b>93.01</b>	<b>55.0</b>	<b>38.01</b>
<b>KXALFM</b>	<b>276C3</b>	<b>Pittsburg</b>	<b>TX</b>	<b>355.5</b>	<b>158.32</b>	<b>117.0</b>	<b>41.32</b>
<b>KIVYFM</b>	<b>224C2</b>	<b>Crockett</b>	<b>TX</b>	<b>256.8</b>	<b>61.97</b>	<b>20.0</b>	<b>41.97</b>
<b>KIXB</b>	<b>277C1</b>	<b>El Dorado</b>	<b>AR</b>	<b>41.9</b>	<b>266.71</b>	<b>224.0</b>	<b>42.71</b>
<b>KEMM</b>	<b>277C2</b>	<b>Commerce</b>	<b>TX</b>	<b>328.1</b>	<b>233.29</b>	<b>190.0</b>	<b>43.29</b>
<b>RADD</b>	<b>274A</b>	<b>Centerville</b>	<b>TX</b>	<b>260.7</b>	<b>102.76</b>	<b>55.0</b>	<b>47.76</b>
<b>KVST.P</b>	<b>279C</b>	<b>La Porte</b>	<b>TX</b>	<b>170.1</b>	<b>164.45</b>	<b>105.0</b>	<b>59.45</b>
Of Note:							
Proposed modified facility of KVST to							
change channel, class and community of							
license in instant PRM at,							
NL: 29-58-19, WL: 94-31-16							
-----							

**AD277C2 (KJCS)**  
**Nacogdoches, TX**  
**New WAVO Communications Inc.**



**Exhibit E, Figure 14**

Area Gain = 0 sq km  
Area Loss = 5,121 sq km  
Pop. Gain = 0  
Pop. Loss = 38,256

AD279C, Nacogdoches, TX  
KJCS(FM), Nacogdoches, TX  
Gain/Loss Study

LOSS AREA

+ KJCS  
(AD277C2)  
31-25-59  
94-49-03

AD277C2  
Hypothetical  
60 dBu

KJCS  
Hypothetical  
60 dBu

Exhibit E, Figure 15

0 25 50  
Kilometers

 REYNOLDS  
TECHNICAL  
ASSOCIATES  
BROADCAST TECHNICAL CONSULTANTS

Area Gain = 0 sq km  
Area Loss = 5,121 sq km  
Pop. Gain = 0  
Pop. Loss = 38,256

AD279C, Nacogdoches, TX  
KJCS(FM), Nacogdoches, TX  
Gain/Loss Study

LOSS AREA

Exhibit E, Figure 16

0 25 50  
Kilometers

 **REYNOLDS  
TECHNICAL  
ASSOCIATES**  
BROADCAST TECHNICAL CONSULTANTS



# ENGINEERING STATEMENT

## In Support of a PETITION FOR RULE MAKING

New WAVO Communications Group, Inc.

### Stations included in KJCS Remaining Services Study

<u>Contour Number</u>	<u>Call Letters</u>	<u>City of License</u>	<u>Channel</u>
1	KLDN	Lufkin, TX	205C1
2	KSAU	Nacagdoches, TX	211C3
3	KSWP	Lufkin, TX	215C1
4	KAVX	Lufkin, TX	220C2
5	KETX	Livingston, TX	222C2
6	KVCC	Woodville, TX	234C2
7	KAFX	Diboll, TX	238C1
8	KZJZ	Conroe, TX	295C
9	KKTL	Cleveland, TX	246C
10	KYKS	Lufkin, TX	286C
11	KTBQ	Nacagdoches, TX	299C2
12	KBJS	Jacksonville, TX	212C1
13	KLJT	Jacksonville, TX	272C2
14	KOOI	Jacksonville, TX	293C
15	KCKT	Crockett, TX	203A
16	KIVY	Crockett, TX	224C2

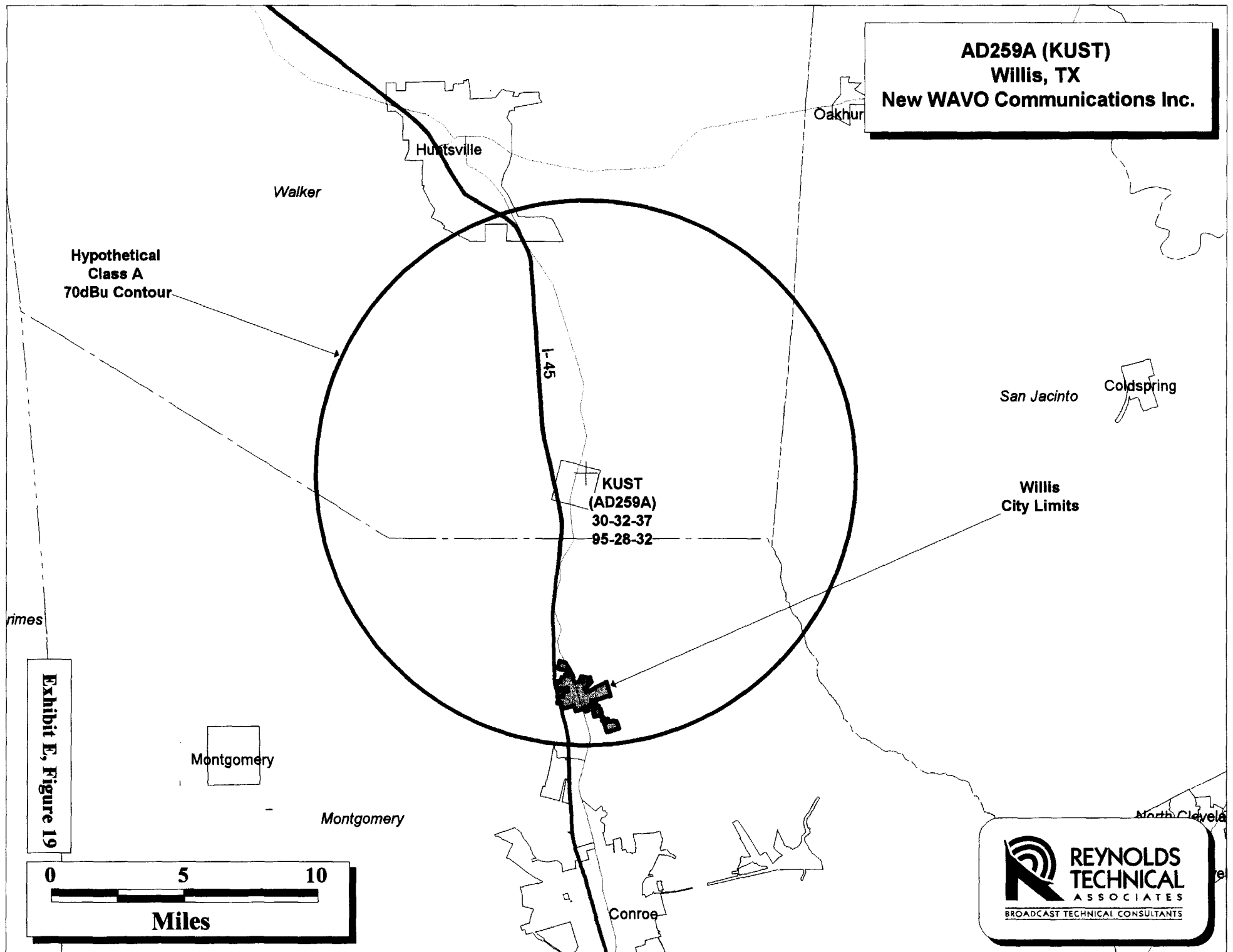
**Engineering Statement**  
**In Support of a**  
**Petition for Rule Making**  
**KVST**

New WAVO Communications Group, Inc.

**Allocation Study - Ch 259A Willis, TX (KUST)**  
**[Depicting no spectrum changes required to allot Ch 259A at Willis]**  
**(Using proposed Ch 259A allotment coordinates as reference)**

30 32 37 N.				Class A			Search Date
95 28 32 W.				Current rules spacings			10-04-00
----- Channel 259 - 99.7 MHz -----							
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin
-----							
<b>Community of Willis</b>			<b>TX</b>	<b>181.6</b>	<b>13.18</b>		
Reference Coordinates:							
North latitude: 30-25-29							
West Longitude: 95-28-46							
<b>KUST</b>	<b>259C3</b>	<b>Huntsville</b>	<b>TX</b>	<b>0.0</b>	<b>17.74</b>	<b>142.0</b>	<b>-124.26 *</b>
Of No Concern:							
Licensed site and facility before							
change in class, site and							
community of license proposed in							
instant PRM							
<b>KODA.A</b>	<b>256C</b>	<b>Houston</b>	<b>TX</b>	<b>173.2</b>	<b>87.61</b>	<b>95.0</b>	<b>-7.39 *</b>
Of No Concern:							
Auxiliary of KODA main facility							
KODA main facility shown below.							
KSHN	260C2	Liberty	TX	120.9	106.32	106.0	0.32 *
KODA	256C	Houston	TX	181.8	107.30	95.0	12.30
KILTFM	262C	Houston	TX	181.8	107.30	95.0	12.30
KBMA	258A	Bryan	TX	278.1	84.64	72.0	12.64
WACOFM	260C	Waco	TX	296.7	196.19	165.0	31.19
RADD	259C2	Bay City	TX	198.8	204.52	166.0	38.52
RDEL	259C2	Palacios	TX	196.5	209.51	166.0	43.51
KKOS	259C2	Palacios	TX	196.5	209.51	166.0	43.51
RADD	261A	Corrigan	TX	50.9	79.64	31.0	48.64
RADD	257A	Corrigan	TX	60.6	80.96	31.0	49.96
-----							

**AD259A (KUST)**  
**Willis, TX**  
**New WAVO Communications Inc.**



**AD259A (KUST)**  
**Willis, TX**  
**New WAVO Communications Inc.**

Willis  
City Limits

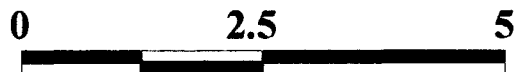
I-45

US Hwy 75

Panorama Village

Hypothetical  
Class A  
70dBu Contour

Exhibit E, Figure 20



**Kilometers**

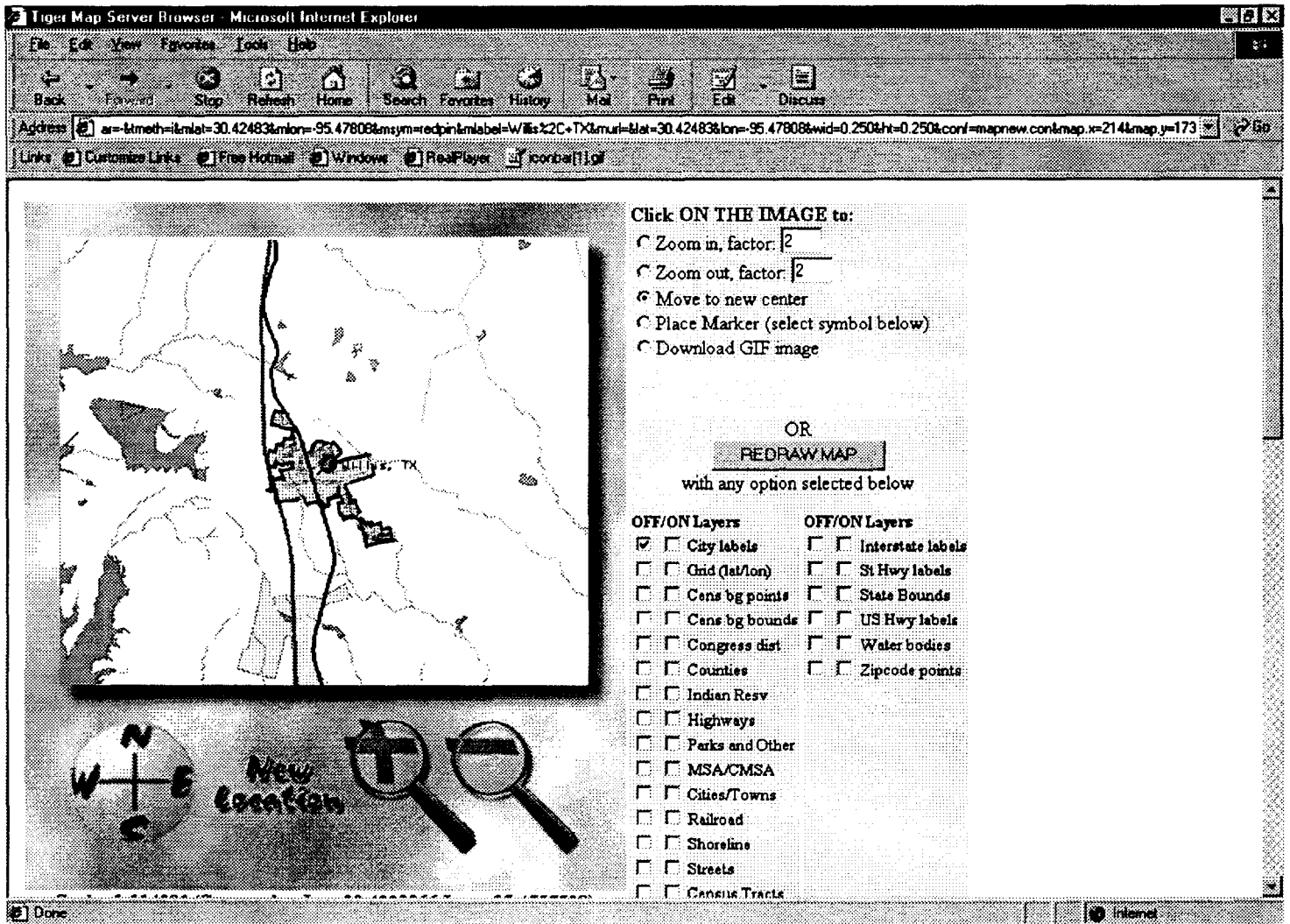


# ENGINEERING STATEMENT

In Support of a  
PETITION FOR RULE MAKING

New WAVO Communications Group, Inc.

## TIGER Map of Willis, Texas



Area Gain = 277 sq km  
Area Loss = 2,563 sq km  
Pop. Gain = 45,835  
Pop. Loss = 34,325

AD259A, Willis, TX  
KUST(FM), Huntsville, TX  
Gain/Loss Study

KUST  
Hypothetical  
60 dBu Contour

LOSS AREA

KUST  
30-42-13  
95-28-32

AD259A  
30-32-37  
95-28-32

GAIN AREA

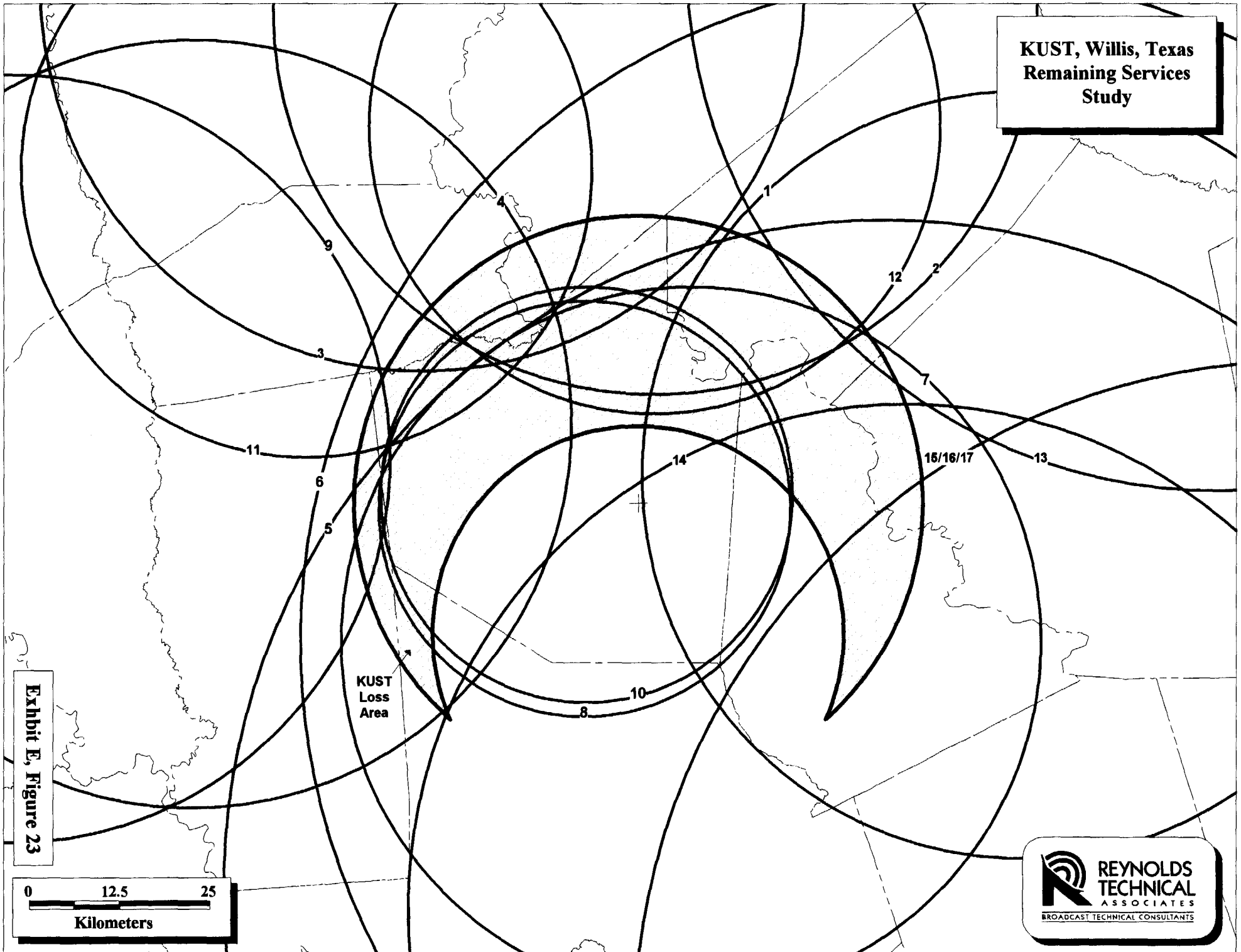
AD259A  
Hypothetical  
60 dBu Contour

Exhibit E, Figure 22

0 12.5 25  
Kilometers



**KUST, Willis, Texas  
Remaining Services  
Study**



# ENGINEERING STATEMENT

## In Support of a COUNTERPROPOSAL

New WAVO Communications Group, Inc.

### Stations included in KUST Remaining Services Study

<u>Contour Number</u>	<u>Call Letters</u>	<u>City of License</u>	<u>Channel</u>
1	KETX	Livingston, Texas	222C2
2	KIVY	Crockett, Texas	224C2
3	KBHT	Crockett, Texas	228C2
4	KAGG	Madisonville, Texas	241C2
5	KZJZ	Conroe, Texas	295C
6	KKTL	Cleveland, Texas	246C
7	KAXF	Conroe, Texas	202C2
8	KSAM	Huntsville, Texas	269A
9	KTSR	College Station, Texas	236C2
10	KSHU	Huntsville, Texas	213A
11	KMVL	Madisonville, Texas	263C3
12	AVAC	Lovelady, Texas	282C3
13	KAFX	Diboll, Texas	238C1
14	KSBJ	Humble, Texas	207C1
15	KTJM	Port Arthur, Texas	253C
16	KOVE	Port Arthur, Texas	227C
17	KRTX	Winnie, Texas	264C



**Engineering Statement**  
**In Support of a**  
**Petition for Rule Making**  
**KVST**  
**New WAVO Communications Group, Inc.**

**Channel Spacing Study - Ch 277C1 Nacogdoches, TX (KJCS)**  
**[Depicting short spacing of existing KJCS class C1 facility to**  
**AVAC 278A Centerville, TX - MM Docket 99-257]**  
**(Using Ch 277C1 operating coordinates as reference)**

31 25 59 N.				Class C1				Search Date
94 49 03 W.				Current rules spacings				10-29-00
----- Channel 277 -103.3 MHz -----								
Call	Ch#	City	State	Bear'	Dist'	R'qrd	Margin	
KJCS	277C1	Nacogdoches	TX	0.0	0.00	245.0	-245.00	*
Of No Concern:								
Present operating site of KJCS								
KJCS	277C1	Nacogdoches	TX	40.3	21.49	245.0	-223.51	*
Of No Concern:								
Previous operating site of KJCS								
RADD	278A	Centerville	TX	263.6	116.61	133.0	-16.39	*
RADD	278A	Centerville	TX	263.6	116.61	133.0	-16.39	*
Of Concern:								
Ch 278A allotted to Centerville in MM Docket 99-257								
RDEL	277C2	Commerce	TX	328.1	233.29	224.0	9.29	*
KEMM	277C2	Commerce	TX	328.1	233.29	224.0	9.29	*
KWYX	274C2	Jasper	TX	116.9	91.42	79.0	12.42	
KXALFM	276C3	Pittsburg	TX	355.5	158.32	144.0	14.32	
AVAC	280A	Hemphill	TX	95.2	91.76	75.0	16.76	
KTHP.C	280A	Hemphill	TX	96.3	93.01	75.0	18.01	
961230	280A	Hemphill	TX	94.5	93.62	75.0	18.62	
KIXB	277C1	El Dorado	AR	41.9	266.71	245.0	21.71	
RADD	277A	Waco	TX	272.8	222.17	200.0	22.17	
KWBUFM	277A	Waco	TX	270.2	224.42	200.0	24.42	
KXALFM	276A	Pittsburg	TX	355.5	158.32	133.0	25.32	
RADD	274A	Centerville	TX	260.7	102.76	75.0	27.76	
KWOW	277C3	Clifton	TX	278.0	240.01	211.0	29.01	
KJOJFM	277C	Freeport	TX	194.6	299.78	270.0	29.78	

# ENGINEERING STATEMENT

## In Support of a PETITION FOR RULE MAKING

New WAVO Communications Group, Inc.

### Cumulative Gain/Loss Study

<u>Station</u>	<u>City</u>	<u>Area Gain (sq. km)</u>	<u>Area Loss (sq. km)</u>	<u>Pop. Gain (1999)</u>	<u>Pop. Loss (1999)</u>
KVST	La Porte, Texas	25,800	3,940	2,843,817	231,796
KUST	Willis, Texas	277	2,563	45,835	34,325
KBIU	Lake Charles, Louisiana	275	2,391	6,324	18,404
<u>KJCS</u>	<u>Nacogdoches, Texas</u>	<u>0</u>	<u>5,121</u>	<u>0</u>	<u>38,256</u>
<b>Totals</b>		<b>26,352</b>	<b>14,015</b>	<b>2,895,976</b>	<b>322,781</b>

Net Totals:

Area Gain (sq. km):

12,337

Pop. Gain (1999):

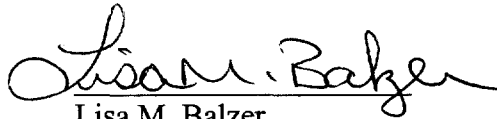
2,573,195

**CERTIFICATE OF SERVICE**

I, Lisa M. Balzer, a secretary in the law firm of Shook, Hardy & Bacon, do hereby certify that I have on this 2nd day of November, 2000 caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Petition for Rule Making**" to the following:

Cumulus Licensing Corp.  
1780 Holly Street  
Fayetteville, AR 72701  
(Licensee of KBIU, Lake Charles, Louisiana)

Howard M. Weiss  
Alison J. Shapiro  
Jennifer Dine Wagner  
Fletcher, Heald & Hildreth, P.L.C.  
1300 N. 17th Street, 11th Floor  
Arlington, VA 22209  
(Counsel to KJCS, Nacogdoches, Texas)

  
Lisa M. Balzer